

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION**

**TERRY VAUGHN and  
SHARON VAUGHN,**

**Petitioners,**

**v.**

**CENTER STREET SECURITIES, INC., JACK  
R. THACKER, and JEFFREY T. KENNEDY,**

**Respondents.**

**Case No. 4:25-cv-00078-SPM**

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**MOTION FOR LEAVE TO APPEAR AT APRIL 10, 2025  
SCHEDULING CONFERENCE VIA ZOOM**

Counsel Michael C. Bixby for Petitioners Terry Vaughn and Sharon Vaughn requests leave of the Court to appear at the April 10, 2025 Scheduling Conference Via Zoom. Counsel has consulted with Respondent Jeffrey T. Kennedy who confirmed he did not oppose Claimant's counsel's appearance via Zoom, though Respondent Kennedy preferred himself to appear in-person.<sup>1</sup> Counsel for Petitioners has a deposition scheduled in another matter (which is also set to take place via Zoom) on April 10, 2025. Petitioners submit that good cause exists to permit the requested remote appearance, as the time and travel costs for Mr. Bixby to appear in-person at the April 10 hearing will cause Petitioners to incur unnecessary and undue expense and due to the conflict with counsel's deposition in another matter, which such conflict can be mitigated if counsel is permitted to appear via Zoom.

Respectfully submitted this 3<sup>rd</sup> day of April, 2025.

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<sup>1</sup> Respondents Center Street Securities, Inc. and Jack. R. Thacker have both defaulted in this matter

/s/ Michael C. Bixby

Michael C. Bixby

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***Attorney for Petitioners Terry & Sharon Vaughn***

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing Answer was filed via the CM/ECF System and served via email to Jeffrey T. Kennedy at [jt@greatwestserv.com](mailto:jt@greatwestserv.com) on this 3rd day of April, 2025.

/s/ Michael C. Bixby